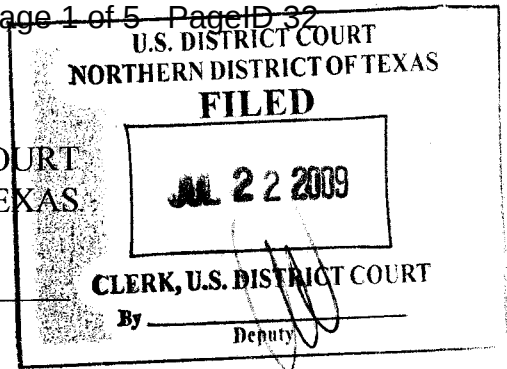


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

JESSE WILLIAM MCGRAW (1)
also known as Ghost Exodus

§
§
§
§
§
§

No.

3-09 CR 210-BINDICTMENT

The Grand Jury Charges:

COUNT ONE

Transmitting a Malicious Code
(18 U.S.C. §1030(a)(5)(A) and §1030(c)(4)(B)(i)(II))

From in or about April 2009 and continuing through in or about June 2009, in the Dallas Division of the Northern District of Texas, defendant **Jesse William McGraw**, also known as Ghost Exodus, did knowingly cause the transmission of a program, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer used in interstate commerce and communication and owned by the Carrell Clinic, located at 9301 North Central Expressway, Dallas, Texas; that is, a computer used to maintain patient medical records for the diagnosis and treatment of the Carrell Clinic patients, in that **McGraw** transmitted a malicious program, code, and command that gave **McGraw** the potential to modify and impair medical examinations, diagnoses, treatments, or care of one or more individuals.

In violation of 18 U.S.C. §1030(a)(5)(A) and §1030(c)(4)(B)(i)(II).

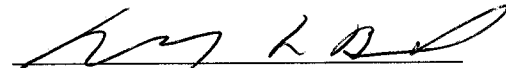
COUNT TWO

Transmitting a Malicious Code
(18 U.S.C. §1030(a)(5)(A) and §1030(c)(4)(B)(i)(II) and (IV))

From in or about April 2009 and continuing through in or about June 2009, in the Dallas Division of the Northern District of Texas, defendant **Jesse William McGraw**, did knowingly cause the transmission of a program, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer used in interstate commerce and communication and owned by the North Central Surgery Center and other tenants in the Carrell Clinic building, located at 9301 North Central Expressway, Dallas, Texas; that is, a HVAC computer controlling the heating, ventilation, and air conditioning for the North Central Surgery Center and other tenants, in that **McGraw** transmitted a malicious program, code, and command that gave **McGraw** the potential to modify the operations of the building HVAC system resulting in the impairment of patient medical examinations, diagnoses, treatments, or the care of one or more individuals, and threatened public health and safety.

In violation of 18 U.S.C. §1030(a)(5)(A) and §1030(c)(4)(B)(i)(II) and (IV).

A TRUE BILL:


FOREPERSON

JAMES T. JACKS
ACTING UNITED STATES ATTORNEY


CANDINA S. HEATH

Assistant United States Attorney
State of Texas Bar No. 09347450
1100 Commerce Street, 3rd Floor
Dallas, Texas 75242
Telephone: 214.659.8600
candina.heath@usdoj.gov

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:
Search Warrant Case Number 3:09-MJ-208; 3:09-MJ-209; 3:09-MJ-210
R 20 from District of N/A
Magistrate Case Number: 3:09-207-MJ

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☒ No

Defendant Name JESSE WILLIAM MCGRAW (1)
Alias Name a/k/a Ghost Exodus
Address 2801 Trinity Oaks Dr., #328
Arlington, TX 76001

County in which offense was committed: Dallas

2. U.S. Attorney Information

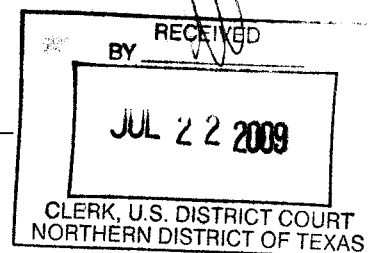
Candina S. Heath Bar # 09347450

3. Interpreter

☐ Yes ☒ No If Yes, list language and/or dialect: _____

4. Location Status

☒ Already in Federal Custody 6/29/09 in Seagoville, TX
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 U.S.C. § 1030(a)(5)(A) and 18 U.S.C. § 1030(c)(4)(B)(i)(II)	Transmitting a Malicious Code	1
18 U.S.C. § 1030(a)(5)(A) and 18 U.S.C. § 1030(c)(4)(B)(i)(II) and IV	Transmitting a Malicious Code	2

Date 7-13-09

Signature of AUSA: [Signature]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

22 2009

CLERK, U.S. DISTRICT COURT

By

DENY

UNITED STATES OF AMERICA

v.

JESSE WILLIAM MCGRAW (1)

3-09 CR-210-B

INDICTMENT

18 U.S.C. § 1030(a)(5)(A) and § 1030(c)(4)(B)(i)(II)
Transmitting a Malicious Code

18 U.S.C. 1030(a)(5)(A) and § 1030(c)(4)(B)(i)(II) and (IV)
Transmitting a Malicious Code

2 Counts

A true bill rendered:

DALLAS

FOREPERSON

Filed in open court this _____ day of _____, A.D. 2009.

Clerk

JESSE WILLIAM MCGRAW - In Custody (Seagoville)

UNITED STATES ~~DISTRICT~~ MAGISTRATE JUDGE

Criminal Complaint 3:09-MJ-207

Magistrate Case No. 3:09-207-MJ

7/22/09